

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ALLISON HETRICK, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

ASCEND LEARNING, LLC,

Defendant.

Civil Action No. 1:25-cv-10103-NMG

MOTION FOR *PRO HAC VICE* ADMISSION OF
MARK DAVID MCPHERSON

Pursuant to Local Rule 83.5.3(b) of the Local Rules of United States District Court for the District of Massachusetts, Defendant Ascend Learning, LLC (“Defendant”) by its undersigned attorneys, hereby moves for admission *pro hac vice* of its counsel Mark David McPherson. As grounds, Defendant states:

1. Mark David McPherson is an attorney practicing with the law firm Goodwin Procter LLP, 620 Eighth Avenue, New York, NY 10018 and is a member in good standing of the Bars of the states of New York and California.

2. In further support of its motion, Defendant submits Exhibit A, the Certificate of Mark David McPherson, stating that he is a member in good standing of the Bar in every jurisdiction in which he is admitted to practice; that there are no disciplinary proceedings against him in any jurisdiction; and that he is familiar with the Local Rules of this Court.

WHEREFORE, Defendant respectfully requests that the Court grant the *pro hac vice* admission of Mark David McPherson.

Dated: March 12, 2025

Respectfully submitted,

/s/ Jennifer Chunias

Jennifer Chunias (BBO No. 644980)

GOODWIN PROCTER LLP

100 Northern Avenue

Boston, MA 02110

Tel: 617-570-1000

Fax: 617-523-1231

JChunias@goodwinlaw.com

*Counsel for Defendant Ascend
Learning, LLC*

LOCAL RULE 7.1(a)(2) CERTIFICATION

I hereby certify that I have conferred in good faith with counsel for Plaintiff Allison Hetrick, individually and on behalf of all others similarly situated, regarding the above-captioned Motion for *Pro Hac Vice* Admission of Mark David McPherson, and they do not oppose the relief requested.

/s/ Jennifer Chunias

Jennifer Chunias

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to the non-registered participants as known this 12th day of March, 2025.

/s/ Jennifer Chunias

Jennifer Chunias